Christopher S. Marks, OSB #022052 cmarks@williamskastner.com Rachel A. Robinson, OSB #084550 rrobinson@williamskastner.com WILLIAMS, KASTNER & GIBBS PLLC 888 SW Fifth Avenue, Suite 600 Portland, OR 97204-2025 Phone: (503) 228-7967

Phone: (503) 228-7967 Fax: (503) 222-7261

Attorneys for Defendants Walter Meier Holding Corporation

The Honorable Garr M. King

## UNITED STATES DISTRICT COURT DISTRICT OF OREGON

## TODD YANDELL,

Plaintiff,

ν.

WALTER MEIER HOLDING AG, a Swiss Corporation; WMH TOOL GROUP, INC., a Tennessee Corporation; WALTER MEIER (MANUFACTURING) INC., a Tennessee Corporation; WALTER MEIER HOLDING CORPORATION, a Delaware Corporation,

Defendants.

Case No. 3:11-CV-266-KI

DEFENDANT WALTER MEIER HOLDING CORPORATION'S UNOPPOSED MOTION FOR EXTENSION OF TIME FOR REPLY IN SUPPORT OF AND HEARING ON RULE 12(b)(2) MOTION TO DISMISS

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## LR 7-1 Certification

In accordance with LR 7-1, counsel for defendant Walter Meier Holding Corporation ("Walter Meier Holding") conferred in good faith with counsel for plaintiff concerning this motion on April 12, 2011. Plaintiff's counsel does not oppose the requested extension of time.

## Motion

Pursuant to Fed. R. Civ. P. 6(b), Walter Meier Holding requests an order (1) extending the deadline for its reply in support of the Rule 12(b)(2) motion to dismiss from April 13, 2011 to April 20, 2011, and (2) resetting the hearing on the motion for a mutually convenient date and time during the week of May 2, 2011. The hearing on the motion is currently scheduled for April 28, 2011 at 9:00 a.m.

This motion is made in good faith and is supported by the declaration of Rachel A. Robinson filed herewith.

DATED this 12th day of April, 2011.

s/ Rachel A. Robinson, OSB #084550 WILLIAMS, KASTNER & GIBBS PLLC Telephone: (503) 228-7967 Attorneys for Defendants Walter Meier Holding Corporation

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